

From: Jessica\_Luo@partner.nps.gov [mailto:[Jessica\\_Luo@partner.nps.gov](mailto:Jessica_Luo@partner.nps.gov)]  
Sent: Thursday, April 17, 2008 10:44 AM  
To: Ken Wiseman; Melissa Miller-Henson  
Subject: National Park Service Official Letter

Dear Ken Wiseman and Melissa Miller-Henson,

Please see below for the official letter from Jonathan Jarvis, Regional Director of the Pacific West Region of the National Park Service to the Blue Ribbon Task Force.

Thank you very much,

Jessica Luo

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Jessica Luo  
Ocean Education and Outreach Coordinator Pacific Coast Science and Learning Center Point Reyes National Seashore Point Reyes Station, CA 94956

jessica\_luo@partner.nps.gov  
office: (415) 464-5132  
----- Forwarded by Jessica Luo/Partner/NPS on 04/17/2008 10:32 AM -----

Jon Jarvis  
Sent by: Karen To:  
MLPAComments@resources.ca.gov cc: (bcc: Jessica  
Washington  
Luo/Partner/NPS)  
Initiative Blue Ribbon Task Force Subject: MLPA

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PACIFIC WEST REGION  
1111 Jackson Street, Suite 700  
Oakland, CA 94607-1372

A76(PWRO-RD)

April 16, 2008

The Honorable Susan Golding, Chair  
MLPA Initiative Blue Ribbon Task Force  
c/o California Resources Agency  
1416 Ninth Street, Suite 1311  
Sacramento, CA 95814

MLPAComments@resources.ca.gov

Dear Honorable Chair Golding and Members of the Blue Ribbon Task Force:

The National Park Service applauds your efforts in helping California implement the Marine Life Protection Act of 1999 (MLPA). We appreciate the opportunity to contribute and participate in the establishment of a network of Marine Protected Areas (MPAs) in California coastal waters. The goals and objectives of the MLPA Initiative in designing a network of marine protected areas to protect marine life and habitats, marine ecosystems, and marine natural heritage, as well as improve recreational, educational and study opportunities provided by marine ecosystems are consistent with the National Park Service Ocean Park Stewardship strategic goals and objectives.

After careful consideration and evaluation, the National Park Service submits its endorsement for the North Central Coast Regional Stakeholders Group (NCCRSRG) Proposal 4, with a few recommendations. We believe that among the three proposals put forth by the NCCRSRG, Proposal 4 best fulfills the mission and charge of the National Park Service. Furthermore, we offer our full support for the comments and recommendations put forth by California State Parks in their April 10, 2008 letter to Chair Golding and the Blue Ribbon Task Force members.

Since the establishment of Acadia National Park in 1916, marine resources in the National Park System have grown to include more than three million acres of ocean and Great Lakes waters and 5,000 miles of coast. More than

75 million people visit 74 ocean parks to experience our nation's heritage where the land meets the water, including beaches, coral reefs, kelp forests, wetlands, glaciers, historic shipwrecks and other places recognized for their beauty and national significance. Congress charged the National Park Service with conserving both natural and cultural resources unimpaired for the enjoyment of current and future generations. Their benefits to the nation as havens for ocean wildlife, places for recreation, and sources of local economic activity are unsurpassed.

In the State of California, coastal and ocean national parks help California citizens understand, protect and connect to 462 miles of California's coast. Each year, Redwood National and State Parks, Point Reyes National Seashore and Golden Gate National Recreation Area (including Muir Woods National Monument, the Presidio, and Fort Point National Historic Site) in the north, and Channel Islands National Park, Santa Monica Mountains National Recreation Area and Cabrillo National Monument in the south host 17.5 million visitors. Park education and outreach programs contribute to citizen understanding and engagement in many coastal issues.

Park monitoring programs inform shared resource stewardship programs in these parks and facilitate research.

The current North Central phase of the MLPA is addressing waters adjacent to two National Parks: Golden Gate National Recreation Area (GGNRA) and Point Reyes National Seashore. These two park areas have management authority over approximately 120 miles of coastline within the North

Central Study Region. While few MPAs were proposed by the stakeholders in GGNRA waters, we acknowledge that these areas are highly used by fishermen and others. During the NCCRSRG draft proposal process, there was limited support for MPAs in the areas around the mouth of the Golden Gate because of safety and proximity to major ports by members of the RSG; however, there has been strong support of MPAs around Devils Slide in GGNRA and around Point Reyes National Seashore. At Point Reyes, there was strong support along the Duxbury Reef complex, in Drakes and Limantour Esteros, and at Point Reyes Headlands. Strong onshore conservation, research, visitor access, and monitoring programs at the parks present an ideal opportunity for pairing terrestrial and shore-based conservation with adjacent MPAs. Point Reyes has also secured funds to assist the California Department of Fish and Game (CDFG) in long-term MPA monitoring for any MPAs located adjacent to NPS waters in the North Central Coast Region. Furthermore, NPS has a dedicated enforcement vessel based at the Point Reyes Headlands which may be useful in MPA education and enforcement.

We submit the following comments and recommendations regarding Proposal 4:

Point Reyes State Marine Reserve (SMR) and Point Reyes State Marine Conservation Area (SMCA) The National Park Service and Point Reyes National Seashore are pleased to see that all three proposals have converged upon a SMR at the Point Reyes Headlands and a SMCA extending to the state line. Though the size and shape of the SMR at Point Reyes Headlands are at the lower limit of what is considered acceptable to Point Reyes National Seashore, we recognize the need to balance conservation requirements with socioeconomic concerns, and acknowledge that the resultant SMR and SMCA at the Point Reyes Headlands came at significant compromise from all stakeholders involved.

#### Drakes Estero

Drakes Estero is one of the most ecologically intact estuaries of California and is part of the only congressionally designated marine wilderness on the west coast of North America south of Alaska. Biologically, the estuary is exceptional, containing extensive eelgrass beds that support and are breeding grounds for many commercial and recreational species of fish and invertebrates, such as lingcod, some species of nearshore rockfish, English sole, and Dungeness crab. The estuary also supports an abundance of shorebirds, waterbirds and raptors such as Western Snowy Plover, Osprey and Black Brant. In addition, Drakes Estero is home to one of the largest harbor seal populations in California, with up to 1800 seals present during the breeding/molting season. There exists a critical and timely need to protect Drakes Estero. The National Park Service supports the SMCA in Drakes Estero, which includes a mariculture lease with the CDFG and a right of reservation with the National Park Service until 2012, when the NPS reservation expires. We strongly support the recommendation that the SMCA be transferred to a full SMR after 2012 because of the ecological significance of the site.

Double Point SMCA, Duxbury SMCA, and Agate Beach Intertidal SMCA The National Park Service supports the Proposal 4 MPAs at Double Point, Duxbury Reef and Agate Beach. Among the three proposals, we consider only Proposal 4 to have the acceptable level of protection for this portion of critical rocky habitat. Currently, the Fitzgerald SMR and

the Bodega Head SMR in all three proposals protect rocky habitat. In the stretch of coastline between Bodega Head and Fitzgerald, the Point Reyes SMR is not sufficiently large to protect significant rocky habitat. This leaves only the highly critical shale reef at Duxbury Reef, which is a rockfish nursery and one of the largest shale reef areas in the state. This is a highly productive area, but it was heavily fished by gillnetting in the 1980's and early 1990's and it has not returned to its previous state since gillnets were restricted from the area. Establishing a MPA in part of the reef is crucial not only to its continued success as a rockfish nursery but also to its restoration as an important reef ecosystem.

#### Stewarts Point SMR and Salt Point SMP

The National Park Service and California State Parks are aligned in mission and objective to protect our natural ecosystems for the enjoyment of current and future generations. Therefore, we strongly support the California State Parks recommendation to the BRTF regarding Stewarts Point SMR and Salt Point SMP to move the southern boundary of the proposed SMR and the northern boundary of the proposed SMP 0.7 miles north to the center of Fisk Mill Cove (latitude 38° 35.6'N). These changes would enhance the entire network of MPAs for the north central California coastal region.

#### Point Reyes Headlands Special Closure

The proposed 1000 ft. special closure at Point Reyes Headlands in Proposal

4 does not extend to the western end of the Headlands. The National Park Service recognizes that this was done due to safety concerns related to safe passage around the headlands. However, there exists the largest Common Murre colony (10,000 murres) on the rocks just off of the headlands. Point Reyes National Seashore will engage in educational outreach with other agencies to limit the impact of disturbance to the Common Murres.

In closing, the National Park Service fully supports the establishment of a network of Marine Protected Areas along the California coast, and we believe that a strong backbone of marine reserves coupled with marine conservation areas is essential for restoring and sustaining the state's ocean ecosystems. The National Park Service at Point Reyes National Seashore is committed to providing the California Department of Fish and Game all possible assistance in law enforcement, monitoring, interpretation and education relating to the marine protected areas, especially in the MPAs located adjacent to National Parks. We support the mission of the Marine Life Protect Act Initiative, and we believe that the California coastal ecosystems need the strongest possible network of marine protected areas to preserve California's natural marine resources for our future generations. We urge the Blue Ribbon Task Force to consider and adopt Proposal 4 with the above modifications.

Sincerely,

/s/ Jonathan B. Jarvis  
(signed original on file)